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July 23, 2025

Via ECF

The Honorable P. Kevin Castel, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007
CastelNYSDChambers@nysd.uscourts.gov

Re: CB1 Capital Advisors LLC v. 4Front Ventures Corp; Docket No. 1:25-cv-04767-PKC

Dear Judge Castel,

We represent Plaintiff, CB1 Capital Advisors LLC (“Plaintiff”), in the above-referenced matter. On June 5, 2025, Plaintiff commenced this action by filing a Complaint seeking to enforce a Consulting Services Agreement dated September 28, 2020, pursuant to which Defendant, 4Front Ventures Corp. (“Defendant”), owes Plaintiff \$400,000 in consulting fees for the period from December 2023 through the present. [DE 1].

On June 9, 2025, the Court issued an Order directing Plaintiff to file an Amended Complaint within forty-five (45) days with additional details concerning diversity jurisdiction. [DE 6]. On June 10, 2025, the Court entered an Initial Pretrial Conference Order. [DE 7]. On June 12, 2025, Ryan M. Jerome filed a Notice of Appearance on behalf of Defendant. [DE 8].

Subsequently, Defendant filed a Suggestion of Bankruptcy, pursuant to Section 69.3(1) of Canada’s *Bankruptcy and Insolvency Act*, indicating that a bankruptcy proceeding is pending in the District of British Columbia, Vancouver Division—*In the Matter of the Bankruptcy of 4Front Ventures Corp.*, Case No. 11-3233771 (the “Bankruptcy Proceeding”). [DE 9]. Plaintiff filed an Amended Complaint on June 25, 2025, in accordance with the Court’s June 9, 2025 Order. [DE 11].

On July 9, 2025, counsel for Defendant filed a motion to be relieved pursuant to Federal Rule of Civil Procedure 7(b) and Local Rule 1.4. [DE 12].

Pursuant to the Court’s June 10, 2025 Order [DE 7], the parties are directed to submit a joint letter and a proposed Case Management Plan under Rule 26(f) in advance of the July 30, 2025 Initial Pretrial Conference. [DE 7]. Given the Bankruptcy Proceeding and defense counsel’s pending motion to withdraw, it is not practical to file a proposed Case Management

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Plan at this time. Instead, Plaintiff respectfully submits that this matter should be stayed pending further action in the Bankruptcy Proceeding.

Accordingly, Plaintiff respectfully requests that this matter be stayed pending bankruptcy and that the July 30 Initial Pretrial Conference be adjourned *sine die*.

We appreciate the Court's efforts and are available to provide any further information that might be required.

Respectfully submitted,

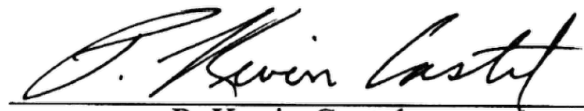


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Upon plaintiff's application and in view of Canadian Bankruptcy proceedings, the matter is stayed until January 30, 2026. File status reports and/or application for continuance of the stay 14 days prior to its expiration. Initial conference on July 30, 2025 is vacated.

SO ORDERED.

Dated: 7/23/2025



P. Kevin Castel
United States District Judge